



# GLOBAL HARVEST MINISTRIES

## WHISTLE BLOWING POLICY

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## Whistleblowing Policy

<b>Who approves the policy?</b>	Head Pastor
<b>Who is responsible for updating the policy?</b>	Trustees
<b>Adapted date</b>	June 2025
<b>Review date</b>	June 2026
<b>Location of Electronic copy</b>	<a href="https://globalharvestministries.co.uk">https://globalharvestministries.co.uk</a>

### Summary of Content

<b>Subject and Aims</b>	The updated policy explains the process of disclosing to someone in authority, allegations of corruption, malpractice or wrongdoing.
<b>Main Points</b>	The policy is applicable to Global Harvest Ministries staff members and volunteers under the control of Global Harvest Ministries.
<b>Consultations</b>	Global Harvest Ministries Trustees

### Summary of Impact

<b>Personnel</b>	Staff members and volunteers should feel confident about taking the steps to disclose information.
<b>Legal</b>	Compliance with the Public Interest Disclosure Act 1998

## Whistleblowing Policy

### 1. Introduction and definitions

Global Harvest Ministries seeks to operate all aspects of business to high standards of conduct and integrity. In the event that a Global Harvest Ministries staff member or volunteer becomes aware of activities which give cause for concern, Global Harvest Ministries has established the following code of practice, which provides a framework, to allow concerns to be raised in confidence and, to allow for a thorough and appropriate investigation of the matter.

Global Harvest Ministries is committed to creating a climate of trust and openness, so that a person who has a genuine concern or suspicion can raise the matter with full confidence that it will be appropriately considered and resolved. Any individual who makes a disclosure of wrongdoing or malpractice will be treated with respect and will be protected against victimisation, provided that the worker had reasonable grounds to suspect the wrongdoing; anyone who victimises a whistleblower will be subject to Global Harvest Ministries disciplinary procedure.

### What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. The act of blowing the whistle is 'making a disclosure in the public interest.'

Global Harvest Ministries considers that the following types of activity or behaviour should be dealt with under this policy:

- Manipulation of accounting records and finances
- Inappropriate use of assets or funds
- Decision-making for personal gain
- Any criminal activity
- Abuse of position
- Fraud and deceit
- Serious breaches of procedure, which may advantage a particular party or any actions likely to bring the reputation of Global Harvest Ministries into question.
- Corruptly receiving any gift or advantage.
- Allowing private interests to override the interests of the church.

NB: *This is not an exhaustive list.*

For allegations where the report is a complaint rather than information of a wrongdoing, or corruption please refer to the Grievance /Complaint policy.

## **2 SAFEGUARDING CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS**

All employees and volunteers have a duty to report concerns about the safety and welfare of children, young people and vulnerable adults.

Concerns about any of the following should be Global Harvest Ministries'

Pastoral team:

- physical abuse
- sexual abuse
- emotional abuse
- neglect
- an intimate or improper relationship between an adult and a vulnerable person

The reason for the concern may be the actions of an employee or a volunteer. Whatever the reason, concerns must be reported.

### **CONFIDENTIALITY**

We hope that whistleblowing concerns can be voiced openly under this policy. Completely anonymous disclosures are difficult to investigate. If a concern is raised confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

### **EXTERNAL DISCLOSURES**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing associated with church activities. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy

### **PROTECTION AND SUPPORT FOR WHISTLEBLOWERS**

Global Harvest Ministries aims to encourage openness and will support whistleblowers that raise genuine concerns under this policy, even if they turn out to be mistaken.

If a safeguarding concern is raised, then the pastor/trustee will liaise with the Safeguarding Team (see Safeguarding Policy).

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If anyone believes they have suffered any such treatment, they should inform the pastor/trustee immediately. If you are an employee and the matter is not remedied you should raise it formally using our Grievance/ Complaint Procedure.

Whistleblowers should not be threatened or experience retaliation in any way. If an employee is involved in any such conduct they may be subject to disciplinary action. In some cases, the whistleblower, as an employee, could have a right to an employment tribunal.

However, if we conclude that a whistleblower who is an employee has made false allegations maliciously or with a view to personal gain, they may be subject to disciplinary action.

### **3 THE PROCESS**

#### **What action should the Whistleblower take?**

Global Harvest Ministries encourages whistleblowers to inform someone with the ability to address the problem. All staff members and volunteers should feel confident about taking the steps to disclose information. The following points will provide some guidance in doing this:

- Staff members and volunteers should inform the Senior Pastor immediately of any suspected wrongdoing or danger in relation to Global Harvest Ministries.
- Depending on the nature of the concern, the whistleblower will be asked to justify and support their claim. Normally they will be asked to do this in writing. It will, therefore, be helpful to note down any facts and dates as they happen.
- If the content of the disclosure involves the Senior Pastor/Elder, then they should refer the disclosure to the trustees. In addition, a potential whistleblower can seek free advice by contacting Protect on 020 3117 2520.
- The Government encourages whistleblowers to contact external groups where appropriate. For example, if a staff member or volunteer has followed the internal procedure to alert the organisation about a health and safety issue and are still concerned about the risk this poses, they can contact the Health and Safety Commission. A full comprehensive list is available [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing).
- Elsewhere in exceptionally serious cases; where internal procedures have been exhausted, and the information is substantially true to their knowledge, staff members may seek to disclose information to the police. The law requires the person making the disclosure to believe and understand the information to be true.
- This can be discussed in confidence but information will need to be disclosed for investigatory purposes. Global Harvest Ministries wants to encourage and embed a culture where staff members feel comfortable speaking of problematic situations and thus whistleblowers will not be penalised for talking.
- The whistleblowing policy is treated differently and separately to a

grievance/complaint policy as the whistleblower making a disclosure may not be directly impacted by the act or behaviour and therefore does not have a personal grievance.

### **About to blow the whistle?**

- Do think about the risks and outcomes before you act. The Public Interest Disclosure Act 1998 is there to protect workers from victimisation. However, the law does require individuals to test when making a disclosure that they reasonably believe the information being disclosed is substantially true and is not for personal gain.
- Let the facts speak for themselves do not make ill-considered allegations
- Remember you may be mistaken or there may be an innocent explanation.
- Do not attempt to become a 'private detective'
- Ulterior motives such as personal vendetta remove your protection.
- When disclosing information through the whistleblowing procedures you are preventing Global Harvest Ministries from what could be a problematic situation if not addressed.
- It is important to stay calm, remember you are the witness not a complainant.

The following reasons for disclosing information will be protected under the Public Disclosure Act 1998:

- Criminal offence
- Failure to comply with legal obligation
- Miscarriage of justice
- Risk to health or safety
- Environmental damage
- Any of the above is likely to be deliberately concealed

Concerns raised are taken seriously and there must be a thorough investigation into the root of the problem. This will determine whether the matter should be managed internally or externally.

There will not always be a prescriptive procedure for how each individual case should be investigated. A minimum of two investigating officers will be nominated by the senior pastor and the trustees.

### **The role of the investigating officers**

- Compile a report with recommendations.
- Present report to the trustees.
- Follow through to ensure there have been appropriate outcomes. For example, if the outcome required fire safety equipment and a fire drill test within a given timeframe, the investigating officer should ensure this is done.
- Should ensure that the recommendations of the report are followed through and the outcome is relayed back to the whistleblower.

**What if the Whistleblower is unsatisfied with the outcome?**

- Please refer to the Global Harvest Ministries Appeals Policy.
- As part of its risk management monitoring function, the trustees will receive an annual report on the operation of this policy.

**Unfounded and malicious reports**

- Global Harvest Ministries sets out to protect whistleblowers with reasonable concern to believe that the disclosure is substantially true; details of this have been discussed throughout this policy.
- However, when a disclosure is found to not be made in good faith or in the interest of the public, Global Harvest Ministries will take action. This could be as serious as a dismissal/removal from role, where it involves a staff member or volunteer.

**4 Conclusion**

Global Harvest Ministries is confident that the existing good practice and internal controls will ensure that cases of suspected fraud or impropriety rarely occur.

The Whistleblowing Policy is provided as a reference document and a commitment that any concerns raised will be taken seriously and action promptly.

## **Useful links**

### **Protect (Formerly Public Concern at Work)**

Free, confidential whistleblowing advice line 020 3117 2520

### **Government Website**

GOV.uk – Whistleblowing

Provides detailed information about:

- Protected disclosures
- Routes of disclosure
- Prescribed persons
- Disclosure in exceptional cases and serious cases.